

# EXHIBIT 6

1. I believe it is necessary to make this statement due to new information relating to my potential transfer (which I believe is retaliatory and improper) from USP Tucson. I was told today, by my unit team, I am recommended for transfer.
2. I am innocent of these charges; I believe the legal term is, "actually innocent." Please see this link to a press conference by Alan Dershowitz and other bipartisan, credible sources:
3. As noted in the press conference, these charges were brought against me using an unprecedented, historical, level of government malfeasance and outright crime.
4. A billionaire media mogul from Mexico, who is well-known to me (whose daughter was a leader in my organization), vowed to spend and do whatever was necessary to put me in prison for the rest of my life - and likely have me killed. Here I am.
5. As an innocent person, I am particularly aware of the improper, and dishonest, things done to me as a prisoner. Although I am a peace activist, and led a peace movement in Mexico, I never imagined the inhumane and abusive conditions, and culture, in our American prisons.
6. I am concerned that as a prisoner my words may not be considered reliable. Please consider what I say. I will try to provide ways of obtaining corroboration.
7. I have heard the B.O.P. has denied that my cell-mate and myself were held in a room with pungent, human feces smeared on the walls (19 hand strokes) and on the floor, for 4 hours, and forced therein to eat our lunch. The Warden, SIA, and other officers specifically executed this. This denial is a verifiable lie. It is not only retaliatory; it is malicious and deplorable if we are allowed to expose Drs. Hermasillo and Polesky, I believe they will not lie. Also here are video cameras which recorded the period of time during which this happened. There are also numerous officers who

passed by the holding cell. What does it mean that the B.O.P. would lie about such a thing?

8. Unfortunately, because of outright lies and deceit, from above the Warden, nationally and downward, I write this knowing there is an active effort to cover-up, and to lessen accountability by deceiving and also shipping me out. With a little effort and precision - even with just the above incident and its denial - the court will see the direct, bad-faith, dishonesty of some high-level people within the B.O.P.

9. Shipping me from USP Tucson, away from my attorneys, in a physically painful, potentially torturous process, into another potentially more dangerous environment foreign to me, is what is traditionally done by B.O.P. to silence and/or punish inmates. Please do not let me be silenced or shipped.

10. Keeping me in the S.H.U., or placing me in a different unit is another form of retaliation and silencing. Please have the B.O.P. return me to my normal unit, C-1, as soon as possible. When one is held in the S.H.U. administratively, as I am now, it is supposed to be substantially similar to being in general population (GP).

Certainly this would mean my attorney visits, and even personal visitation would be virtually identical to being in GP. This is absolutely not the case. Simple questioning of B.O.P. officials, and my attorneys, along with B.O.P. video footage will establish what I say. My concern is they will ship me before any of this can happen. Please do not allow this.

11. As one demonstration of how the B.O.P. creates and sets-up retaliatory, punitive, and/or dangerous situations, examine my current cell-mate placement: Toni Fly is a known hermaphrodite. She has filed 75 PREA complaints on other inmates and also many on staff. B.O.P. claims she is very violent and mentally unstable. B.O.P. records will show she has threatened to kill any sex-offender cell-mate with whom she is celled. I am convicted as a sex-offender. I am also said to be a sex cult leader and a threat to women. Immediately before we became



Cell-mates she was raped, brought to the hospital, then put on suicide watch. She came directly from suicide watch to my cell. Why would USP Tucson house a violent, 75+ PREA, vulnerable to rape, vowed to kill sex-offenders, with me, an alleged sex-offender, cult-leader, abuser of vulnerable women? Why was Whitey Bolger sent to an active yard? The sad answer is: planned harm.

12. Another point of note: My cell-mate is the only known USP Tucson inmate with female genitalia (as reported by both B.O.P. reports and inmates.) Imagine having that in an institution with many, many, male rapists and sex offenders. Yet the B.O.P. refuses to transfer her to a female facility, or house her single-celled as multiple B.O.P. Doctors having directly recommended.
13. There are many other verifiable maladies: Medical, S.H.U., restraint chair left, rape, and death that can be shown. All of them highlight a defective, broken, dishonest system that needs to be addressed.
14. My unit team informed me my transfer is because of too much legal activities: Calls and visits. I average less than 1 visit (2-3 hours) and 1 call (1 to 2 hours) per week. Months ago, I was cleared by S.T.S., DHO, and S.H.U. to go back to G.P. but mysteriously, my case was "rerouted". After almost 4 months in the S.H.U. I am being shipped. As wrongful and inappropriate as this transfer is, it is also illustrative: the B.O.P. will do almost anything to protect itself, cover-up its misdeeds and abuses, and do so with impunity. Let's start to stop this now. Please have them return me to my old unit in G.P., not ship me. Also be sure they provide a safe environment for I have witnessed, even in my own case, inmates who, working with certain officers cause problems and serious injuries to those the B.O.P. (or officers) would silence. Don't let me be silenced. Please have the B.O.P. keep me here, in G.P., in my old unit, safely, so I can earn my freedom and demonstrate my actual innocence in the larger context. I am innocent, please let me not be silenced.



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side 2
15. It is now Sunday 11/13. I wrote the above 14 points yesterday, but today I spoke to someone from my unit team.
16. They informed me I was being recommended for transfer for an extended 3 reasons: 1) Too much legal, 2) Too many administrative remedies, 3) better programming elsewhere. Note: I am not participating in programming so "better programming" is irrelevant. These are my rights. I am not exceptional in any category <sup>fair</sup> and there is no reason to ship me. I am being shipped for retaliation and possibly to attempt to gain some legal advantage in this case and others.

I certify, under penalty of perjury, the above is correct and true to the best of my knowledge. I also grant my attorneys the right to retype, format, or edit, this affidavit, and sign for me using this as a reference / source document.

Keith Rinker 11/12/22

Copy  
of what  
I gave  
Ms. Fly

Toni Fly; 18658-023

Also Known as:

William Anthony Fly

Plaintiff, pro-se

v.

M. Diaz; Mark Gutierrez;

United States, et al.

Defendants

Case No. 4:21-CV-00506-TVC-SHR

Second Declaration of:

Keith Alan Paniere

I. Declaration under penalty of perjury:

1. I declare the following to be true and correct and I will testify to:
2. I am the current cellmate of Ms. Toni Fly; and I have been her cellmate since September 8, 2022.
3. I did hear Ms. Fly speak to her former cell-mate "Chanel" Edwin Texidor-Nunez. I heard them both speaking to each other in English. I ~~never~~ heard them speak to each other in Spanish. Specifically, Texidor-Nunez spoke English not only to Ms. Fly, but also to several other inmates on the range, and to correction staff, including case manager Ms. Mack. Ms. Fly can speak rudimentary Spanish but, unlike with some other inmates, it appeared unnecessary for her to do so with Texidor-Nunez.
4. I heard Texidor-Nunez, the 25'er prison gang members, and other inmates say, in English, that Ms. Fly "ratte" on Texidor-Nunez for raping Ms. Fly. When Texidor-Nunez was leaving the S.H.U., I heard her tell Ms. Fly she (Texidor Nunez) had something for Ms. Fly and she would get it no matter where Ms. Fly was shipped. I interpreted this as a threat of violence ~~through~~ Texidor-Nunez's friends.
5. I heard Ms. Fly talk about Texidor-Nunez working for S.I.S. since they were both previously together at USP Yavapai. Texidor-Nunez did not deny this. Texidor-Nunez called Ms. Fly a "rat" and said Ms. Fly



Put a PREA on Texidor-Nunez.

6. I heard Texidor-Nunez tell everyone on the range that Ms. Fly had sex with her 9-year-old daughter up until she was 19, called Ms. Fly a "chomo rat" and then said to the range "Kill the chomo!" This was right after both Ms. Fly and Texidor-Nunez returned from S.I.S. interviews about Ms. Fly being raped by Texidor-Nunez.

7. Inmates from on the compound and in the S.H.U. started telling Ms. Fly she was in a cell with a "sex cult leader" (me) immediately following the S.I.S./PREA interview with Texidor-Nunez.

8. I have a current pending civil rights action in Arizona District Court:

9. I heard Ms. Fly tell Texidor-Nunez that Texidor-Nunez admitted to being told by Staff to assault Ms. Fly. Texidor-Nunez did not deny this. I also saw an affidavit/Declaration seemingly signed and submitted to the court stating Texidor-Nunez "works for the BOP" and "has to do what they say". The affidavit/Declaration was brought to Ms. Fly, in her legal possessions, from her cell with Texidor-Nunez, right after she came directly from suicide watch to my cell.

## II. Certification

I certify, swear, affirm, and declare the foregoing to be true and correct to the best of my information, knowledge, and belief, under penalty of perjury.

Keith Alan Baniere #57005-177

Keith Alan Baniere 11/19/22



Keith ALAN Ranjere  
PLAINTIFF

V.

Merrick Garland, et al.,  
DEFENDANTS.

CASE NO. 4:22-cv-00212-TKR-RCC

DECLARATION OF MS. TONI FLY;  
Federal ID. 18658-023  
ALSO KNOWN AS:  
WILLIAM ANTHONY FLY.

I, Declaration under Penalty of Perjury:

1. I declare The Following to be TRUE and correct to The best of MY INFORMATION, knowledge, OR BELIEF, and I WILL testify to;
2. I am a Federal Prisoner, CURRENTLY Housed at USP-tucson
3. I am CURRENTLY The cell mate OF Keith ALAN Ranjere, and have been since September 8, 2022, upon MY RETURN FROM Suicide Watch, University Medical Center of Tucson, and a Rape INTERVIEW, after MY previous cell mate Edwin Texidor-Nunez Beat and Raped me;
4. I have been Raped by 75 separate male born inmates and MULTIPLE staff members.
5. I have a Pending civil Rights action: 4:21-cv-00564-TKR-SHR (D. AZ), and Habeas corpus Appeal: 21-1495 (7th Cir).
6. ON OR about September 9, 2022 Executive staff came to A-Range cell #119 and asked me about my legal work, stated "CUFF UP" and escorted MR. Ranjere and I to a Holding cell, in which had Human feces smeared on The walls, and Floor and clothing in The cell.



7. MR. RANIERE and I were left in this cell for several hours, and forced to eat in the feces cell.
8. I was taken out by Psychology due to the severe emotional distress, anxiety, and concern over not only the constitutional cruel and unusual punishment in retaliation for my legal pursuits,
9. The Psychologists DR'S. Flemming-Hermossillo, and Poleski, did not want to enter the cell, as the smell was so intensely bad and overwhelming even from outside the cell.
10. DR. Poleski took me to the 5th Psychology office, and did say the feces had been there over 24 hours from the prior day.
11. DR. Poleski attempted to return me to my cell, however Retaliatory staff refused, and insisted, I be returned to the "shit cell", though DR. Poleski argued that it is not a safe environment, unsanitary, hazardous to both my physical and mental health. CO Francis said he did not care. She asked if I could be placed in a more sanitary room until I was returned. 5th staff said "NO", The Lieutenant, Captain, and Warden said I stay up there in that cell.
12. I was returned to the feces ridden cell with MR. RANIERE.



13. UPON RETURN TO Cell 119 ON A RAMP, ALL OF MY LEGAL WORK WAS MISSING.
14. I did NOT Receive my legal work back UNTIL The Following mid-week, and it was torn, ripped, and soaking wet.
15. I have heard on multiple occasions, MR. RANIERE speaking to his unit team, and he was informed that they wanted him shipped (TRANSFERRED) due to his legal pursuits to be exacerbated. MR. Flores stated "you have too many legal visits" when asked by MR. RANIERE why he was being transferred.
16. I heard SPS LT. JOSHUA CHRISTENSEN state, "You should return to the compound." I recommended return to general population and both SPS LT'S: REHL and DELEON state "just waiting on the signatures to return you to G.P." Then a new SPS investigation was opened. I now heard MR. RANIERE's unit team state "for better programming opportunities" as the new reason.

#### II. CERTIFICATION:

I CERTIFY, SWEAR, AND AFFIRM, and declare the foregoing statements to be true and correct to the best of my information, knowledge, or belief under penalty of perjury.

MAG. TONY FRY  
ALSO KNOWN AS:

18658-023

William Anthony Fry  
Tony Fry

15 NOV 2022



Notes of  
2<sup>nd</sup> declaration  
I gave Ms. Fly

Same as Second declaration only Third declaration.

1. + 2. Same.

3. I have observed one occasion where Ms. Fly did not receive her morning medication. On that occasion, no one on our range received medication, including inmates who normally receive insulin.
4. When several inmates demanded an explanation the answer given was, "a woman didn't show up in medical."
5. On at least 5 occasions Ms. Fly was given either the wrong medications or incorrect amounts of the correct medication. On a few occasions she was finally given the correct medication after vigorously complaining. On other occasions she was left with what she received.

Same Cert. 11/15/22